

VIA E-MAIL ONLY

November 4, 2019

Stacy Guidry, Section Chief
Medicaid Program Operations and Compliance
Louisiana Department of Health
628 N. 4th Street
Baton Rouge, LA 70802

**RE: Notice of Action for Louisiana Healthcare Connections - NEMT Vendor/Provider
Non-compliance**

Dear Stacy:

While we disagree with the conclusions that Louisiana Healthcare Connections (LHCC) failed to properly oversee and monitor its NEMT broker, Logisticare (LGTC), as outlined in your October 21, 2019 correspondence, we are happy to respond to the matters you have raised.

Outside of the allegations, LHCC has also identified areas where additional improvements can be made to further strengthen the existing monitoring of LGTC and have taken actions to address these areas. Furthermore, LHCC has worked with and continues to work with LGTC to improve their performance. Please note that prior to receipt of the notice of action LHCC hired an additional Vendor Management Analyst and had already initiated plans to hire six (6) additional Vendor Management Analysts.

- 1. LHCC failed to properly oversee and monitor its NEMT broker to ensure that all of its transportation providers are in compliance with insurance requirements in accordance with its contract with LDH.**

Response:

- 1. Please see the certificates of insurance accompanying this response for 1st Choice Transportation and Alexandria Transportation Company, LLC. LHCC would like to point out that 1st Choice was already in compliance with the insurance requirements as required per section 2.6.2 of the contract prior to the notice of action. We believe there to have been an oversight on LDH's part in the review of their paperwork. Alexandria Transportation Company, LLA was required to update their insurance information to be in compliance with the insurance requirements and that updated documentation is attached.

LGTC Actions:

LGTC will improve their pre-screening process when onboarding transportation providers and drivers. LGTC now utilizes Salesforce CRM (Customer Relationship Manager) software to track all contracting process documents. This will provide greater visibility to credentialing documents throughout the contracting and ongoing operating periods. LGTC will also begin a two level internal verification process within the compliance department when new documents for drivers, vehicles, or contracts are received so that errors in documentation requirements can be avoided. This process updates will be fully implemented no later than 01/01/2020.

Every six (6) months, LGTC will also perform an internal audit of 100% of the Louisiana provider's compliance and credentialing files for completeness and accuracy. The first audit will take place in January 2020 and will be a 6 month look back. Results of the LGTC internal audits will be provided to the LHCC Vendor Management team following completion of the audits.

LHCC Actions:

The LHCC Vendor Management team will conduct monthly audits of LGTC's provider network to ensure compliance with all credentialing requirements. These audits will be comprised of a random sampling of the transportation providers each month. The first LHCC Vendor Management audit will begin no later than January 2020.

- 2. LHCC failed to properly oversee and monitor LGTC to ensure that the company consistently and timely provided transportation to critical medically necessary services, resulting in patient no-shows to appointments as reported by members and service providers.**

Response:

Regarding the Seaside Healthcare members that were unable to be discharged. In both cases the Exception Specialist with LGTC was supposed to put the member's pending trips in the "discharge queue", which was not done and as a result the transportation scheduling was ultimately delayed. The staff member has been educated on the correct process. LHCC asserts this was not the result of a lack of oversight or a provider no show for a scheduled trip, but rather a human error. LHCC confirmed this in a response to LDH dated

Regarding the August 8, 2019 incident report by Fresenius Kidney Care (FKC). According to LogistiCare's records, the trip on 6/15/19 was not assigned to Alexandria. It was assigned to Mo's Transportation. The driver did not show up for the ride because the driver overslept. However, when the dialysis center called Where's My Ride, they were told that

member's reason for failure to show up for their scheduled transportation. This indirectly affects the network by occupying driver's time unnecessarily while waiting for the member. This process of reviewing the member no show report by our case management team will begin no later than 01/01/2020.

LGTC Actions:

Members experiencing repeated "provider no shows" (based on the weekly provider no show report that is pulled), will be placed automatically on the LGTC VIP list. The VIP list is a list of members that receives extra checks when rides are scheduled and proactively monitored by the Logisticare National Member Experience Team to ensure a successful trip is completed. This process update is to be fully implemented no later than 12/01/2019.

LHCC Actions:

LHCC Vendor Management will work with our Utilization Management team to determine a prioritization list for transportation. For instance, during rare transportation shortages, appointment types such as dialysis, chemotherapy, and wound care would be at the top of the list while value-adds would be on the bottom. This process update and list will be completed no later than 12/01/2019.

- 3. LHCC failed to properly oversee and monitor its NEMT brokerage program to ensure compliance with vehicle, driver and credentialing requirements in accordance with its contract with LDH and state law requirements.**

LGCT Actions:

LGTC will implement a process to screen all trips originating in and occurring within Jefferson and Orleans parish to ensure only providers with all necessary permits conduct these trips. LGTC will ensure these transportation providers are in compliance with the Code of Ordinances City of New Orleans (Code 1956, §§ 12-41, 12-69; New Orleans City Code 162-202, M.C.S., Ord. No. 17,164, § 1, 9-7-95; Ord. No. 19,609, § 1, 4-6-00) Jefferson Parish Ordinance 22477 section 5-26, and La. R.S. 45:200.3

LGTC will conduct monthly audits to ensure that any trips from Orleans or Jefferson parishes were conducted by transportation providers with the proper permits and to identify any trips that may have been assigned in error so that corrections to internal processes can be identified and corrected. This includes trips originating from those locations as well as trips conducted within those parishes. The monthly audit procedure will be implemented no later than 12/01/2019.

LGTC currently receives an 'addition and termination' report from Jefferson Parish NEMT Compliance that notes all new or terminated provider permits. LGTC will establish a point of contact with Orleans Parish so that we may receive a comparable update from them

regarding new and expiring permits. This point of contact will be established no later than 12/01/2019.

LHCC Actions:

During LHCC Vendor Management monthly audit of transportation providers, LHCC will also review all trips conducted within Orleans and Jefferson parish to ensure compliance with all city and parish ordinances as stated above. This audit process will be in place no later than 12/01/2019.

- 4. LHCC failed to properly oversee and monitor LGTC to ensure compliance with all applicable provisions of 42 CFR §438. 608 and 438.610 pertaining to debarment and/or suspension.**

Response:

LHCC and LGTC assert that LGTC is in full compliance with all applicable provisions of 42 CFR §438. 608 and 438.610 pertaining to debarment and/or suspension and that the websites listed are utilized as part of the monthly exclusion checks currently done. Upon additional review of Alexandria Transportation Company, LLA, 1st Choice Transportation, and D&T Reliable Transportation, LGTC found no drivers that should have been reported as excluded. As such LHCC requests the names of the drivers identified by LDH as being excluded so that we may further research those.

LHCC Action:

LHCC Vendor Management will include exclusions screening records in monthly audits and will begin auditing of these records no later than 12/02/2019.

- 5. LHCC has failed to properly oversee and monitor LGTC's performance despite LGTC being placed on a corrective action plan (CAP).**

Response:

LHCC asserts that we are in compliance with section 7.13.6 et al of the contract. In addition to existing monthly JOCs and annual corporate audits, we will also begin the LHCC Vendor Management monthly auditing program as mentioned in the areas above. The monthly auditing program will be in place no later than 01/01/2020. LHCC Vendor Management will also continue to make recommendations to LHCC leadership regarding recommended corrective actions.

Please accept this as LHCC's written response to all issues outlined above that includes the dates by which each issue will be resolved.

Should you have any questions, please do not hesitate to contact me.

Sincerely,



Jamie Schlottman, CEO
Louisiana Healthcare Connections

cc: Kendra Case
Joe Sullivan
Joshua Larroquette
Erin Hawley
Sara Morthland
Michael Boutte
Melanie Doucet
Debbie Lewis
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